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July 22, 1997

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

In re: Submission of Information Regarding LMAs
Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154

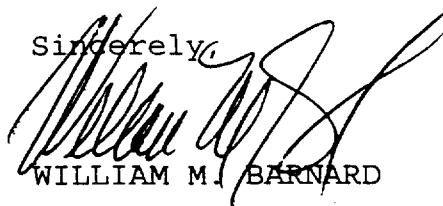
Dear Sir:

As your files will indicate the licensees of Stations WDKA(TV), Paducah, Kentucky and KBSI(TV), Cape Girardeau, Missouri, filed a response to the Commission's request for LMA information on July 8, 1997. For convenience, a copy of the stamped-in copy of this submission is attached hereto.

Numbered paragraph 5 correctly states that the term of the Agreement is 10 years, but incorrectly refers to the execution date as the beginning of the term. The commencement date was June 6, 1997, and the term is thus June 6, 1997 - June 6, 2007. Also, numbered paragraph 5 refers to a right of first refusal. The provision referred to is actually notice given to the Brokering Station of commencement of negotiation with third parties rather than a right of first refusal and there is no right of first refusal.

If any further information is requested in regard to this matter, please contact undersigned counsel.

Sincerely,



WILLIAM M. BARNARD

WMB/sls

cc: James P. Riley, Esquire

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In re: Submission of Information Regarding LMAs
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Dear Sir:

This response is filed on behalf of Stations WDKA(TV), Paducah, Kentucky the "Brokered Station" and KBSI(TV), Cape Girardeau, Missouri, the "Brokering Station" in response to the Commission's Public Notice requesting additional information contained in local marketing agreements (LMAs). The information requested is supplied in the same numerical sequence as contained in the Public Notice.

1.	<u>Brokered Station</u>	<u>Brokering Station</u>
Licensee:	WDKA Acquisition Corp.	Max Television of Cape Girardeau L.P.
Call Letters:	WDKA(TV)	KBSI(TV)
Channel:	49	23
Community of License:	Paducah, Kentucky	Cape Girardeau, Missouri

2. Name and rank of DMA in which Brokered and Brokering Stations are Located:

Paducah, Kentucky/Cape Girardeau, Missouri/
Harrisburg-Mt. Vernon, Illinois
Nielsen DMA Rank 79

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3. Common area of overlap, indicated as percentage of total contours:

	<u>City Grade</u>	<u>Grade A</u>	<u>Grade B</u>
WDKA	35% of KBSI	43% of KBSI	53% of KBSI
KBSI	46% of WDKA	56% of WDKA	72% of WDKA

4. LMA entered: December 15, 1995

5. Start/End Dates Renewal Provision
- | | |
|--|---|
| December 15, 1995 -
December 15, 2005 - | Negotiations for one or more additional terms shall commence 18 months prior to termination date. Brokering station has right of first refusal if LMA entered with third party. |
|--|---|

6. Contract provides for Brokering Station to provide 158 weekly hours, barring preemption by Brokered Station (this would constitute 94% of 168 hours of operation).

7. Brokered Station - UPN
Brokering Station - Fox

8. Share of all day audience in three most recent rating period:

	5/97	2/97	11/96
Brokered Station *	0	0	0
Brokering Station	4	5	5

* Station went on the air in June, 1997.

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9. Submitted herewith by Station WDKA is a summary of public interest benefits that have occurred as a result of the LMA between the stations.

Sincerely,

WDKA Acquisition Corp.

By: 

James P. Riley
Its Attorney

Fletcher, Heald & Hildreth, P.L.C.
1300 17th Street, 11th Floor
Rosslyn, Virginia 22209
(703) 812-0459

Max Television of Girardeau L.P.

By: 

William M. Barnard
Its Attorney

Evans & Sill, P.C.
1627 Eye Street, N.W.
Suite 810
Washington, D.C. 20006
(202) 293-0700

WDKA-TV Public Interest Benefits

Prior to the time brokerage agreement, only a construction permit existed for WDKA-TV. Under the time brokerage agreement WDKA was able to be built at a significant investment including tower, transmitter and studio.

The time brokerage agreement with WDKA resulted in the hiring by the broker of 12 new employees, which in a medium size market is a significant number, in addition to the licensee's employees.

The station provides an important full time outlet to the new UPN Network which will help the new network grow and compete with the established networks.

The station provides more children's educational programming to the market as well as additional sports programming, such as St. Louis Cardinals baseball games, College Football and Basketball games.

Providing a fifth station to the market allowed very good syndicated programming to again be seen in the market, such as the highly acclaimed Cheers, Matlock, Coach. WDKA also provides another voice for significant public service announcements.